

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**PL Sum. J.
Ex. 079**

JANE DOE 1-4,

Plaintiffs,

v.

**WESTMONT HOSPITALITY
GROUP, INC., et al.,**

Defendants.

CIVIL ACTION FILE

NO. 1:21-cv-04278-WMR

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

**PLAINTIFF JANE DOE 4’S AMENDED AND SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS,
INC.’S FIRST INTERROGATORIES**

Plaintiff Jane Doe 4 (“Plaintiff” or “Jane Doe 4”) hereby provides these amended and supplemental responses to Defendant Red Roof Inns, Inc.’s (“Defendant” or “RRI”) First Interrogatories (the “Interrogatories”). Jane Doe 4 incorporates by reference the objections to these Interrogatories served on March 23, 2020. In particular, to the extent Jane Doe 4 provides identifying information of “Victims of Sex Trafficking,” as that term is defined in this Court’s Protective Order, (Doc. 192 at 5), Jane Doe 4 does so only subject to the provisions of that order. (*Id.* at 5, 15.) Jane Doe 4 reserves the right to

that are protected by the attorney-client privilege, work-product doctrine or any other privilege. Jane Doe 4 will not provide such information or documents.

Subject to these objections and the foregoing general objections and objections to definitions and instructions, Jane Doe 4 states that she will produce non-privileged documents responsive to discovery requests lodged in this case, subject to her objections.

INTERROGATORY NO. 6:

Please provide a timeline of your Trafficking Occurrences at RRI Smyrna, RRI Atlanta, and the Suburban Extended Stay Chamblee from 2010-2013, with specific reference to the day, month, year. For each occurrence identified, please include: the location of each Trafficking Occurrence; the identity of the organization trafficking you; the name and role of every individual trafficker that assisted or facilitated trafficking you; the names and roles of every hotel personnel, agent, or otherwise that in any way assisted or facilitated each Trafficking Occurrence; the means employed to prevent you from leaving; which, if any, of the other Jane Does filing lawsuits in the United States District Court for the Northern District of Georgia that were also trafficked at the same location for each Trafficking Occurrence; and the names of other victims or witnesses with knowledge for each Trafficking Occurrence.

ORIGINAL RESPONSE TO INTERROGATORY NO. 6: Jane Doe 4

objects to this Interrogatory because the total number identifiable subparts, along with other Interrogatories, exceeds the total permitted by the Federal Rules of Civil Procedure. Jane Doe 4 further objects to this Interrogatory to the extent it calls for information that is protected by the attorney-client privilege,

work product doctrine, or any other privilege. Jane Doe 4 will not reveal such information.

Subject to these objections, the foregoing general objections and objections to definitions and instructions, Jane Doe 4 provides the following description of her trafficking at the RRI Smyrna, RRI Atlanta, and Suburban Extended Stay Chamblee. Jane Doe 4 reserves the right to amend or supplement this description as discovery progresses.

Jane Doe 4 was trafficked by [REDACTED] a/k/a Diablo or Diablo Redwings from about the end of 2010 to 2013. She met Diablo at her grandmother's apartment complex on Winding River Drive in the parking lot. Diablo lured her into being a sex trafficking victim by first telling her that he was her boyfriend, which she initially believed. She moved into his apartment and almost immediately, he started to exert control over her and force her to have sex for money. He would hit her if she didn't comply. Diablo collected the money the buyers gave to Jane Doe 4.

Diablo was affiliated with a group of traffickers called PIVIP, which stands for Pimps in Very Important Places. This group had a special hand signal of a P, which members would bring up to their eyes. Other members of the PIVIP group include Bagz, Blessed, CB, Fresh, Kuk, Panama, Nitty, Quan, Tricky, and Ant. The PIVIP group had a studio off of Northridge Parkway near Exit 6 on Georgia 400 where they would meet.

Jane Doe 4 was trafficked at the RRI Smyrna and the RRI Atlanta by Diablo sometime in late 2011 or 2012. She believes Jane Doe 3 was also trafficked at one of these two hotels. And she believes she was trafficked at the Suburban Extended Stay Chamblee by Diablo at least once. When she stayed at the Suburban Extended Stay, Panama was also there with a sex trafficking victim. Jane Doe 4 may have reserved rooms at these hotels in her own name, but she also believes Black could have reserved the rooms for the traffickers. Diablo may also have reserved rooms, but Jane Doe 4 is not sure what ID he may have used.

Jane Doe 4 states that throughout her trafficking, she believes hotel employees, including employees at these three hotels, likely witnessed well-known and visible signs of sex trafficking including physical deterioration, malnourishment, poor hygiene, fatigue, sleep deprivation, injuries, a failure to make eye contact with others, lack of control and possession of money, physical evidence of beatings by her trafficker, and monitoring by her traffickers. In addition, during her trafficking, including while at these hotels, the hotel rooms where she was trafficked would have evidenced numerous well-known and visible signs of sex trafficking. Frequently, the trash cans in the rooms in which Jane Doe 4 was trafficked contained an extraordinary number of used condoms. The rooms also contained multiple cell phones. Moreover, people in these rooms also frequently requested an excessive

amount of towels from housekeeping. In addition, while trafficked at these hotels, the number of daily male visitors to the rooms where the victims were was obviously indicative of sex trafficking. Often more than 10 men visited a victim's room each day, each for short periods.

AMENDED AND SUPPLEMENTAL RESPONSE: Subject to Jane Doe 4's objections stated above, Jane Doe 4 provides the following additional information:

Diablo trafficked Jane Doe 4 from 2010 to 2012. For much of 2013, Jane Doe 4 was not trafficked, and then she was trafficked for a few days by CB. During the time she was trafficked by CB, Jane Doe 4, does not recall that she was trafficked at the Smyrna Red Roof Inn.

INTERROGATORY NO. 7:

Please identify and describe in reasonable detail every injury, illness, condition, inability to function, diagnosis received (from any individual or facility identified below in Interrogatory No. 9) or anything else that you contend was directly and/or proximately caused by the events alleged in your Amended Complaint, the duration each existed, and to what extent you have recovered from each.

ORIGINAL RESPONSE TO INTERROGATORY NO. 7: Jane Doe 4

objects to this Interrogatory as vague and confusing because it asks for detail of every "inability to function." Jane Doe 4 further objects to this Interrogatory to the extent it is premature because it calls for information subject to disclosure under Federal Rule of Civil Procedure 26(a)(2). Plaintiff will disclose such

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, I served a true and correct copy of the within and foregoing **PLAINTIFF JANE DOE 4'S AMENDED AND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC.'S FIRST INTERROGATORIES** via email to the following attorneys of record:

Admir Allushi
Charles Kyle Reed
Emma J. Fennelly
Lewis Brisbois Bisgaard & Smith, LLP
600 Peachtree Street, NE
Suite 4700
Atlanta, GA 30308
adi.allushi@lewisbrisbois.com
chuck.reed@lewisbrisbois.com
emma.fennelly@lewisbrisbois.com
***Attorneys for Defendants Red Roof
Inns, Inc., RRI III, LLC, FMW RRI NC, LLC, Westmont Hospitality
Group, Inc., WHG SU Atlanta, LP, and SUB-SU Hotel GP, LLC***

Christopher S. Keith
Elliott C. Ream
Warner S. Fox
Hawkins Parnell & Young, LLP-GA
Suite 4000
303 Peachtree Street, N.E.
Atlanta, GA 30308-3243
skeith@hpylaw.com
eream@hpylaw.com
wfox@hpylaw.com
Attorneys for Defendant Varahi Hotel, LLC

/s/ Michael R. Baumrind

Michael R. Baumrind
Georgia Bar No. 960296

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VERIFICATION

The answers set forth in **PLAINTIFF JANE DOE 4'S AMENDED AND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT RED ROOF INNS, INC's INTERROGATORIES** are true and correct to the best of my knowledge, information and belief based on the information currently available to me. I reserve the right to make changes to these Objections and Responses if it appears that an error or omission has been made therein or if more information becomes available.

I hereby verify, pursuant to 28 U.S.C. § 1746 and subject to penalty of perjury that the factual information contained in the foregoing responses to

interrogatories is true and correct to the best of my knowledge, information and belief.

This ____ day of June, 2022.

DocuSigned by:

[Redacted Signature]

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Jane Doe 4